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*Attorneys for Defendants*  
TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIANS FOR ALTERNATIVES TO  
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS  
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**DECLARATION OF ALEXANDER  
MOORE IN SUPPORT OF  
DEFENDANTS TRAVIS MOREDA  
DAIRY AND TRAVIS MOREDA'S  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
ANSWER (FRCP 6(b), 60(b) AND  
LOCAL RULE 6.3)**

*[Filed concurrently with Motion and  
[Proposed] Order]*

*Assigned for all purposes to the  
Honorable Susan Illston*

**DECLARATION OF ALEXANDER MOORE**

I, Alexander Moore, declare and state as follows:

1. I am an associate at King & Spalding LLP and am licensed to practice law in the State of California. I represent Defendants in the above-captioned matter. I have personal knowledge of the facts set forth herein, and if called as a witness I could and would competently testify thereto.

2. I am the attorney primarily responsible for this case and who is responsible for calendaring, preparing, and filing the Answer.

3. I traveled from Oakland, California to Cheyenne, Wyoming on December 23, 2024 to be with my family for the holidays and returned to Oakland on December 28, 2024.

4. During this time, Mr. Hsiao was out of the office for the holidays.

5. My mother has a serious chronic illness that required my personal attention and care for the duration of my visit.

6. I inadvertently neglected my calendar deadlines and did not file TMD's Answer until December 30, 2024.

7. On December 31, 2024, I met and conferred with Plaintiff's counsel regarding this motion. Plaintiff does not oppose the motion. Attached as **Exhibit A** is a true and correct copy of this correspondence.

8. TMD has diligently participated in this case. Following the Court's November 22 Order, on December 5, 2024, the parties met and conferred to discuss TMD's site improvements and settlement of the instant action.

9. The granting of this motion will have no impact on further proceedings set by the Court's Case Management Scheduling Order.

10. I have put additional procedures in place to calendar and confirm due dates so that this mistake does not happen again.

1 I declare under penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct.

3 Executed this 31st day of December 2024, in San Diego, California.

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6 A handwritten signature in black ink, appearing to read 'Alexander Moore', is written over a horizontal line.

7 Alexander Moore  
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# EXHIBIT A

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**From:** William Carlon <william@carlonlaw.com>  
**Sent:** Tuesday, December 31, 2024 12:01 PM  
**To:** Alex Moore; William Verick; brian; David Williams  
**Cc:** Peter Hsiao  
**Subject:** Re: Californians for Alternatives to Toxics v. Travis Moreda Dairy, Case No. 3:24-CV-06632-SI - Request for One Day Extension

**CAUTION: MAIL FROM OUTSIDE THE FIRM**

Hi Alex,

We are not going to oppose the motion.

Thanks,  
Will

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**From:** Alex Moore <AMoore@KSLAW.com>  
**Sent:** Tuesday, December 31, 2024 8:22:04 AM  
**To:** William Carlon <william@carlonlaw.com>; William Verick <wverick@igc.org>; brian <brian@brianacree.com>; David Williams <dhwil7@gmail.com>  
**Cc:** Peter Hsiao <PHsiao@KSLAW.com>  
**Subject:** Californians for Alternatives to Toxics v. Travis Moreda Dairy, Case No. 3:24-CV-06632-SI - Request for One Day Extension

All—

Yesterday, we filed an Answer in the above-captioned matter one court day late. The Answer was due on Friday, December 27. We plan to file a motion today to request the Court's permission for this late filing. Please let us know if you oppose this request by 2 p.m. today so that we may inform the Court.

Best regards,  
Alex

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**Alexander Moore**

*Associate*

King & Spalding LLP

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